

## Chris Schnieders

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**From:** Chris Schnieders  
**Sent:** Tuesday, May 14, 2019 11:08 AM  
**To:** Mullen, Kurt; Kelly, Brian  
**Cc:** Adam Haenel; Matt.Donohue@hklaw.com; Joe.Franco@hklaw.com; Knights, Mark  
**Subject:** RE: Dr. Kapoor Deposition  
**Attachments:** Kapoor Amended Notice.5.14.19.pdf

Kurt -

I'm attaching a notice for the deposition. I will look forward to receiving any objections by May 23, 2019 as discussed below.

Thanks, Chris

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**From:** Mullen, Kurt <kmullen@nixonpeabody.com>  
**Sent:** Monday, May 13, 2019 4:29 PM  
**To:** Chris Schnieders <CSchnieders@NapoliLaw.com>; Kelly, Brian <bkelly@nixonpeabody.com>  
**Cc:** Adam Haenel <AHaenel@NapoliLaw.com>; Matt.Donohue@hklaw.com; Joe.Franco@hklaw.com; Knights, Mark <mknight@nixonpeabody.com>  
**Subject:** RE: Dr. Kapoor Deposition

Chris,

Thanks for your e-mail. As you may recall, we stood down on serving objections to the document requests and filing a motion to quash while Plaintiffs and Insys worked out the supplemental joint motion to allow Insys-related witnesses to be deposed beyond the discovery deadline. We are planning to file and serve these by May 23, which is 14 days after we received your e-mail below. Please let Brian, Mark Knights or me know if you would like to discuss. Thanks.

Best,  
Kurt



**Kurt M. Mullen**  
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The NP Boston office *has moved!* We are now located at **Exchange Place – 53 State Street.**

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**From:** Chris Schnieders <[CSchnieders@NapoliLaw.com](mailto:CSchnieders@NapoliLaw.com)>  
**Sent:** Thursday, May 9, 2019 2:04 PM  
**To:** Mullen, Kurt <[kmullen@nixonpeabody.com](mailto:kmullen@nixonpeabody.com)>; Kelly, Brian <[bkelly@nixonpeabody.com](mailto:bkelly@nixonpeabody.com)>

**Cc:** Adam Haenel <[AHAenel@NapoliLaw.com](mailto:AHaenel@NapoliLaw.com)>; [Matt.Donohue@hklaw.com](mailto:Matt.Donohue@hklaw.com); [Joe.Franco@hklaw.com](mailto:Joe.Franco@hklaw.com)

**Subject:** Dr. Kapoor Deposition

[EXTERNAL E-MAIL]

Kurt –

As you recall, we agreed to wait until after the criminal trial to take Dr. Kapoor's deposition for the Opioid MDL. Now that the trial has concluded, we need to get the deposition back on calendar. Please provide dates for the deposition in late May or June.

Thanks, Chris

**Chris Schnieders**

Partner



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